Message 103

Communication from the Commission - TRIS/(2024) 2570

Directive (EU) 2015/1535

Notification: 2024/0341/DK

Forwarding of the observations of a Member State (Germany) (article 5, paragraph 2, of Directive (EU) 2015/1535). These observations do not have the effect of extending the standstill period.

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1. MSG 103 IND 2024 0341 DK EN 26-09-2024 23-09-2024 DE COMMS 5.2 26-09-2024

2. Germany

3A. Bundesministerium für Wirtschaft und Energie, Referat E B 3, 11019 Berlin,
Tel.: 0049-30-2014-6392, E-Mail: infonorm@bmwi.bund.de

3B. Bundesministerium für Ernährung und Landwirtschaft, Referat 315, 53123 Bonn,
Tel.: 0049-228-529-3659, E-Mail: 315@bmel.bund.de

4. 2024/0341/DK - C00A - AGRICULTURE, FISHING AND FOODSTUFFS

5. article 5, paragraph 2, of Directive (EU) 2015/1535

6. Draft Regulation on compensation for compliance with minimum requirements for the use of methane-reducing animal feed and subsidies for the additional voluntary use of methane-reducing feed in 2025;
here: comments pursuant to Article 5(2) of Directive (EU) 2015/1535

With reference to EU communication 20241650.DE 2024/0341/DK 001 - (EC)2015/1535, the following comments are made.

Germany welcomes voluntary measures as a contribution to climate change mitigation from the establishment of precision feeding for farm animals. With regard to the efficient utilisation of nutrients and nitrogen in the feeding of dairy cattle, the German Society of Nutrition Physiology has revised its feed evaluation and supply recommendations based on the current state of scientific findings. These advances are to be translated into practical application in livestock farms and used to reduce methane emissions.

The subsidy commitments under the Regulation notified by Denmark on compensation for compliance with minimum requirements for the use of methane-reducing feed and subsidies for the additional voluntary use of methane-reducing feed in 2025 are linked to the applicant’s daily use of feed additives containing the active substance 3-nitrooxypropanol (3-NOP) in order to meet the minimum requirement. The Regulation does not clearly specify whether the minimum requirement for the dosage of at least 60 mg 3-NOP per kg of dry matter covers the total daily ration of a dairy cow throughout the entire year (with the exception of the dry period). Some scientific studies indicate that the methane-reducing effect of 3-NOP decreases after the first 100 days of the lactation period. In light of recent scientific publications, there is particular interest in the basis used by Denmark to determine the expected average reduction in methane emissions of 28.5 % per dairy cow per year. Also of particular interest is how the expected reduction in methane emissions in 2025 is to be verified.

In conjunction with the feed additive 3-NOP, only high-fat feed materials are mentioned in connection with the additional

voluntary use of methane-reducing feed. No minimum requirement for the allocation of fat via high-fat feed materials nor their specification are laid down in the Regulation. It is of interest to understand why the sole use of high-fat complete feed is not recognised for a subsidy obligation, especially since it is unknown that the methane-reducing effects of fat depend on the simultaneous use of 3-NOP in the ration.

The use of 3-NOP is the precondition for the subsidy obligation, although this could restrict the development and establishment of feeding strategies with methane-reducing effects. Against this background, it is of interest to understand why this feed additive was granted a monopoly position with a company-bound authorisation, which also excludes competition in pricing.

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European Commission
Contact point Directive (EU) 2015/1535
email: grow-dir2015-1535-central@ec.europa.eu